



**SAFETY RESEARCH  
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February 27, 2019

**FOIA REQUEST**

National Freedom of Information Officer  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW (2822T)  
Washington, DC 20460  
(202) 566-1667

To Whom It May Concern:

This is a request under the Freedom of Information Act (FOIA), 5 U.S.C. sec 552.

We request the following information associated with Ford Motor Company's (Ford) February 21, 2019 announcement that Ford would be voluntarily disclosing information to the EPA related to an investigation into potential concerns with how Ford calculates road load (press release attached).

- A copy of the complete file associated with any investigation and/or audits related to this announcement,
- A copy of all independent testing conducted by EPA and/or the National Vehicle and Fuel Emissions Laboratory (NVFE), as well as documents related to the EPA's oversight of any testing conducted by Ford,
- All records of communications between the EPA and Ford related to this matter; this includes telephone, paper, and electronic correspondence between the EPA and Ford and/or either party's surrogates and/or contractors, as well as comments made to the EPA by Ford and/or their surrogates and/or contractors,

Please provide your response within 20 business days, as specified in the FOIA and please confirm receipt of this request with a tracking number should we need to contact the EPA regarding the status. Please send any documents as soon as they are available to the above address. We will pay for any costs incurred up to \$100; please contact us if fees are expected to exceed this amount.

If you choose to withhold any portion of the requested documents, please cite the specific exemption of the FOIA Act you feel justifies the denial. Further, we request notification of the appeal procedures available to us, and the time constraints that we must adhere to.

Thank you for your assistance. Please do not hesitate to call if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Erica Little", with a stylized flourish at the end.

Erica Little  
Research Librarian  
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erica@safetyresearch.net

# Ford Media Center

## FORD INVESTIGATING PROCESS FOR U.S. EMISSIONS CERTIFICATION CONCERNING ROAD LOAD

Feb 21, 2019 | DEARBORN, Mich.

**DEARBORN, Mich., Feb. 21, 2019** - *The following can be attributed to Kim Pittel, group vice president, Sustainability, Environment & Safety Engineering, Ford Motor Company:*

"In September, a handful of employees raised a concern through our Speak Up employee reporting channel regarding the analytical modeling that is part of our U.S. fuel economy and emissions compliance process.

At Ford, we believe that trust in our brand is earned by acting with integrity and transparency. As part of this, we have a process for looking at how we perform and behave in our broad and complex company.

As a result of the concern, we have taken a number of actions. Specifically:

- We have hired an outside firm to conduct an investigation into the vehicle road load specifications used in our testing and applications to certify emissions and fuel economy.

Road load is a vehicle-specific resistance level used in vehicle dynamometer testing, including for fuel economy ratings and emissions certifications. Road load is established through engineering models that are validated through vehicle testing, including physical track tests referred to as coastdown testing.

- Ford has retained independent industry technical experts as part of our investigation team.
- We are hiring an independent lab to conduct further coastdown testing as part of our investigation.
- Ford also is evaluating potential changes to our road-load modeling process, including engineering, technical and governance components.
- This week, we voluntarily shared these potential concerns with Environmental Protection Agency and California Air Resources Board officials.

The investigation and potential concerns do not involve the use of defeat devices in our products. At this time, there's been no determination that this affects Ford's fuel economy labels or emissions certifications.

We plan to work with regulators and the independent lab to complete a technical review. As part of our review, we have identified potential concerns with how we calculate road load. The first vehicle we are evaluating is the 2019 Ranger; we are assessing additional vehicles as well.

As always, we strive to be transparent with our customers, employees, dealers, shareholders and other stakeholders. We understand how important it is to all audiences that we thoroughly yet swiftly complete this investigation."

## About Ford Motor Company

Ford Motor Company is a global company based in Dearborn, Michigan. The company designs, manufactures, markets and services a full line of Ford cars, trucks, SUVs, electrified vehicles and Lincoln luxury vehicles, provides financial services through Ford Motor Credit Company and is pursuing leadership positions in electrification, autonomous vehicles and mobility solutions. Ford employs approximately 199,000 people worldwide. For more information regarding Ford, its products and Ford Motor Credit Company, please visit [www.corporate.ford.com](http://www.corporate.ford.com).